

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

)
) Chapter 11
)
) Case No. 23-00623 (TJC)
)
) (Jointly Administered)
)
) **Objections Due: May 30, 2024 at 4:00 p.m.**
Hearing Date: *Only if objections are filed*

**NOTICE OF CORRECTED INVOICE AND EXTENDED OBJECTION DEADLINE
FOR SEVENTH MONTHLY APPLICATION OF SILLS CUMMIS & GROSS P.C.
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
THE PERIOD FROM FEBRUARY 1, 2024 THROUGH FEBRUARY 29, 2024**

PLEASE TAKE NOTICE that on the 7th day of May 2024, Sills Cummis & Gross P.C. (“Sills”) filed its *Seventh Monthly Application for Allowance of Compensation for Services Rendered as Counsel to the Official Committee of Unsecured Creditors for the Period From February 1, 2024 Through February 29, 2024* [Docket No. 1025] (the “Application”) with the United States Bankruptcy Court for the Northern District of Iowa (the “Court”).

PLEASE TAKE FURTHER NOTICE that the Application inadvertently attached the incorrect invoice.

PLEASE TAKE FURTHER NOTICE that, attached hereto as **Exhibit A**, is the correct invoice for the Application.

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the Application must be made filed with the Court and served so as to be received by the following parties no later than **May 30, 2024 at 4:00 p.m.:**

1. Mercy Hospital, Iowa City, Iowa, 500 E. Market Street, Iowa City, Iowa 52245, Attn: Mark E. Toney (noticing@mercycic.org);
2. Counsel to the Debtors: (A) McDermott Will & Emery LLP, 444 W. Lake Street, Suite 4000, Chicago, Illinois 60606, Attn: Felicia Gerber Perlman, (fperlman@mwe.com), Daniel M. Simon (dsimon@mwe.com), and Emily C. Keil (ekeil@mwe.com) and 2501 North Harwood Street, Suite 1900, Dallas, TX 75201, Jack G. Haake (jhaake@mwe.com), and (B) Nyemaster Goode, P.C., 625 First Street SE, Suite 400, Cedar Rapids, IA 52401-2030, Attn: Roy R. Leaf (rleaf@nyemaster.com);
3. Counsel to the Committee: (A) Cutler Law Firm, P.C., 1307 50th Street, West Des Moines, IA 50266, Attn: Robert C. Gainer (rgainer@cutlerfirm.com), and (B) Sills

Cummis & Gross P.C., The Legal Center, One Riverfront Plaza, Newark, NJ 07102, Attn: Andrew H. Sherman (asherman@sillscummis.com) and Boris Mankovetskiy (bmankovetskiy@sillscummis.com);

4. Office of the United States Trustee for the Northern District of Iowa, 111 Seventh Avenue SE, Suite 2800, Cedar Rapids, IA, 52401, Attn: Janet G.L. Reasoner (Janet.G.Reasoner@usdoj.gov); and
5. Counsel to the Bondholder Representatives: (A) Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., One Financial Center, Boston, MA 02111, Attn: William Kannel (wkannel@mintz.com), Nathan F. Coco (nfcoco@mintz.com), and Megan Preusker (mpreusker@mintz.com), and (B) Whitfield & Eddy, P.C., 699 Walnut Street, Suite 2000, Des Moines, IA 5030, Attn: Peter J. Chalik (chalik@whitfieldlaw.com).

PLEASE TAKE FURTHER NOTICE that, if an objection is properly filed and served in accordance with the above procedures, a hearing (the "Hearing") on the Application will be held at a time and date to be determined before the Honorable Thad J. Collins, United States Bankruptcy Judge, United States Bankruptcy Court for the Northern District of Iowa, 111 7th Ave. SE, Cedar Rapids, IA 52401. Only objections made in writing and timely filed and received will be considered by the Court at such Hearing.

Dated: May 23, 2024

Respectfully submitted,

/s/ Andrew H. Sherman

Andrew H. Sherman, NJS Bar No. 042731991

(admitted *pro hac vice*)

Boris I. Mankovetskiy, NJS Bar No. 012862001

(admitted *pro hac vice*)

SILLS CUMMIS & GROSS, P.C.

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Newark, New Jersey 07102

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-and-

/s/ Robert C. Gainer

Robert C. Gainer IS9998471

CUTLER LAW FIRM, P.C.

1307 50th Street

West Des Moines, Iowa 50266

Telephone: 515-223-6600

Facsimile: 515-223-6787

E-mail: rgainer@cutlerfirm.com

*Attorneys for the Official Committee of
Unsecured Creditors*

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2024, the foregoing instrument was filed electronically with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all registered users party to this proceeding.

/s/ Robert C. Gainer

Sills Cummis & Gross
A Professional Corporation

The Legal Center
One Riverfront Plaza
Newark, NJ 07102-5400
(973) 643-7000

Official Unsecured Creditors Committee of Mercy Hospital
c/o Steindler Orthopedic Clinic, Committee Chair
Attn: Edward Patrick Magallanes, President and CEO
222 W. Merchandise Mart Plaza #2024
2751 Northgate Drive
Iowa City, IA 52245

April 1, 2024
Client/Matter No. 08650147.000001
Invoice: 2055897
Billing Attorney: AHS
Federal Tax Id: 22-1920331

RE: Creditors' Committee

For Legal Services Rendered Through February 29, 2024

				HOURS	AMOUNT
101 – ASSET ANALYSIS AND RECOVERY					
02/09/24	MS	101	Emails with J. Teele re: draft lien challenge complaint.	0.10	
02/13/24	BM	101	Analysis regarding resumption of discovery from PH.	0.60	
02/14/24	BM	101	Analysis regarding disposition of JV interests.	1.10	
02/15/24	BM	101	Analysis regarding liquidation of contingent assets.	0.80	
02/16/24	BM	101	Analysis regarding draft motion regarding workers compensation program.	0.60	
02/19/24	BM	101	Analysis regarding Debtors' proposed motion regarding workers compensation program.	0.60	
02/22/24	BM	101	Analysis regarding remaining asset valuations and projected waterfall scenarios.	0.90	
TASK TOTAL 101				4.70	\$4,338.50

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				HOURS	AMOUNT
102 – ASSET DISPOSITION					
02/01/24	GAK	102	Review sale motion and notice of hearing on same.	0.30	
02/01/24	GAK	102	Review notice of sale closing.	0.10	
02/01/24	GAK	102	Review motion seeking distribution from sale proceeds.	0.10	
02/02/24	BM	102	Analysis regarding JV and real estate sale process.	0.60	
02/07/24	BM	102	Analysis regarding disposition of remaining assets.	0.90	
02/09/24	JT	102	Telephone conference with A. Sherman and O. Matviyishyn re: motion to distribute assets.	0.60	
02/09/24	JT	102	Review master trustee motion to distribute assets.	0.80	
02/09/24	OM	102	Review and analyze Master Trustee's distribution motion and circulate to J. Teele, A. Sherman, and B. Mankovetskiy.	0.50	
02/09/24	OM	102	Correspondence with A. Sherman, B. Mankovetskiy, and J. Teele re: objection to Master Trustee's distribution motion.	0.40	
02/09/24	OM	102	Begin draft of objection to Master Trustee's distribution motion.	0.70	
02/11/24	OM	102	Draft distribution motion objection background.	1.40	
02/12/24	JT	102	Office conference with O. Matviyishyn re: objection to distribution motion.	0.40	
02/12/24	OM	102	Email correspondence with J. Teele pursuant to objection.	0.20	

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				HOURS	AMOUNT
02/12/24	OM	102	Research inequity of paying creditor whose claim is subject to dispute.	1.70	
02/12/24	OM	102	Continue drafting distribution and edit background and preliminary statement pursuant to comments from J. Teele.	3.30	
02/12/24	OM	102	Correspondence and strategy with J. Teele re: objection distribution motion.	0.30	
02/12/24	OM	102	Continue drafting objection to distribution motion.	1.20	
02/13/24	JT	102	Revise/review final version of objection to distribution motion.	1.70	
02/13/24	MS	102	Call with J. Teele re: objection to Master Trustee's motion to distribute sale proceeds.	0.20	
02/13/24	MS	102	Emails with O. Matviyishyn re: objection to Master Trustee's motion to distribute sale proceeds.	0.20	
02/13/24	OM	102	Correspondence with M. Savetsky re: allowed claims in bankruptcies.	0.20	
02/13/24	OM	102	Update distribution motion objection pursuant to updates to the committee challenge.	0.40	
02/13/24	OM	102	Further correspondence with J. Teele re: objection to distribution motion.	0.20	
02/13/24	OM	102	Draft argument section of distribution motion objection.	2.40	
02/13/24	OM	102	Continue research of inequities of allowing payment of disputed claims.	2.10	
02/13/24	OM	102	Finalize objection to the distribution motion and circulate to J. Teele for review.	1.80	

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				HOURS	AMOUNT
02/13/24	OM	102	Review and make changes to objection to distribution motion pursuant to comments to from J. Teele and circulate to A. Sherman and B. Mankovetskiy for review.	0.30	
02/21/24	BM	102	Analysis regarding disposition of JV interests.	0.90	
02/22/24	BM	102	Analysis regarding disposition of JV interests.	1.20	
02/27/24	BM	102	Analysis regarding Debtors' correspondence to JCSI relating to JV interest.	0.70	
02/29/24	BM	102	Analysis regarding disposition of JV interests and valuation issues.	0.80	
02/29/24	GAK	102	Review numerous motions to reject leases.	0.20	
TASK TOTAL 102				<u>26.80</u>	<u>\$15,994.00</u>
103 – BUSINESS OPERATIONS					
02/07/24	MS	103	Review Debtors' motion to reject Steindler agreements.	0.20	
TASK TOTAL 103				<u>0.20</u>	<u>\$167.00</u>
104 – CASE ADMINISTRATION					
02/01/24	MS	104	Review proposed administrative claims bar date order as filed and confirm language in order.	0.10	
02/06/24	BM	104	Call with Debtors' counsel regarding pending matters.	0.60	
02/07/24	MS	104	Draft email to A. Sherman re: various pending motions and analysis of same.	0.40	

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				HOURS	AMOUNT
02/07/24	OM	104	Review docket and send reminders re: slate of issues for 2/22 omnibus hearing.	0.20	
02/07/24	OM	104	Review pleadings slated for 2/22 omnibus hearing and circulate objection status and deadlines to M. Savetsky, B. Mankovetskiy, and A. Sherman.	0.60	
02/07/24	OM	104	Review, analyze and circulate research re: classification of claims to M. Savetsky.	0.20	
02/07/24	OM	104	Review docket, update critical dates calendar, and circulate same to team with reminders.	0.30	
02/08/24	BM	104	Analysis regarding proposed stipulation extending challenge and related deadlines.	0.60	
02/08/24	BM	104	Prepare a Committee update.	0.40	
02/09/24	OM	104	Update critical dates calendar with new hearing dates and objection deadlines pursuant to agreement with Master Trustee and correspondence with M. Savetsky re: same.	0.20	
02/12/24	JT	104	Office conference with A. Sherman re: cash collateral and discovery.	0.30	
02/12/24	MS	104	Review proposed administrative claims bar date order and notice as submitted to court post-hearing.	0.20	
02/12/24	OM	104	Review and analyze exclusivity and administrative bar date motions and circulate critical pieces to A. Sherman and B. Mankovetskiy.	0.70	
02/13/24	JT	104	Email from/to A. Sherman re: stipulation extending deadlines and complaint.	0.40	

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				HOURS	AMOUNT
02/14/24	BM	104	Call with PH's counsel regarding scheduling issues.	0.20	
02/14/24	BM	104	Call with Committee chair regarding pending matters.	0.40	
02/14/24	JT	104	Review stipulation extending deadlines.	0.30	
02/15/24	BM	104	Call with Debtors and PH's counsel regarding plan proposal.	0.80	
02/15/24	OM	104	Review docket, update critical dates calendar, and circulate same to team with reminders.	0.30	
02/16/24	BM	104	Analysis of issues regarding extension of challenge related deadlines and stipulation regarding same.	0.70	
02/19/24	BM	104	Analysis regarding second amended stipulation regarding cash collateral extension.	0.40	
02/20/24	BM	104	Call with Committee Chair regarding pending matters.	0.30	
02/21/24	BM	104	Prepare an update for Committee.	0.60	
02/21/24	GAK	104	Review Debtors' motion to wind-down workers' compensation program and pay related expenses.	0.10	
02/22/24	BM	104	Analysis regarding proposed forms of orders for CBRE and PRA.	0.60	
02/26/24	BM	104	Attend Committee meeting.	0.50	
02/26/24	OM	104	Review docket, update critical dates calendar, and circulate same to team with reminders.	0.30	
02/26/24	OM	104	Draft request for status conference and correspondence with A. Sherman re: same.	0.90	

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				HOURS	AMOUNT
02/26/24	OM	104	Review and finalize request for status conference pursuant to edits and comments from A. Sherman.	0.20	
02/27/24	MS	104	Review and revise request for status conference.	0.50	
02/27/24	MS	104	Emails with A. Sherman and call with B. Mankovetskiy re: request for status conference.	0.10	
02/27/24	OM	104	Review and provide feedback to M. Savetsky re: draft letter to D. Simon of debtor's counsel.	0.20	
02/27/24	OM	104	Review and circulate new challenge deadline and Distribution Motion objection deadline to team with reminders.	0.30	
02/27/24	OM	104	Draft administrative claim deadline update for the committee and correspondence with B. Mankovetskiy re: same.	0.40	
02/28/24	BM	104	Respond to creditors' inquiries regarding case status.	0.40	
02/29/24	OM	104	Review docket, update critical dates calendar pertaining to status conference and circulate same to team with reminders.	0.10	
TASK TOTAL 104				<u>13.80</u>	<u>\$10,153.00</u>

105 – CLAIMS ADMINISTRATION AND OBJECTIONS

02/07/24	BM	105	Analysis regarding pension fund issues and potential claim treatment.	1.30	
02/07/24	MS	105	Emails with A. Sherman and B. Mankovetskiy re: pension claims issues.	0.20	

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				HOURS	AMOUNT
02/08/24	AHS	105	Research re: pension claims and treatment.	0.80	
02/12/24	BM	105	Analysis regarding objection to PH's motion to distribute sale proceeds.	1.10	
02/13/24	BM	105	Analysis regarding opposition to PH's motion to authorize distribution of sale proceeds.	0.90	
02/13/24	BM	105	Analysis regarding revisions of draft complaint against bondholder representatives.	1.20	
02/13/24	AHS	105	Email to counsel for pension committee re: claim status.	0.30	
02/15/24	BM	105	Analysis regarding updated estimated admin and priority claims.	0.60	
02/15/24	BM	105	Analysis regarding pension plan termination issues and potential claims.	1.10	
02/16/24	GAK	105	Review order establishing administrative bar date and related notifications.	0.10	
02/21/24	BM	105	Analysis regarding administrative and priority claims.	0.70	
02/23/24	BM	105	Call with PH's counsel regarding Committee's proposed settlement term sheet.	0.30	
02/26/24	BM	105	Analysis regarding updated valuation and 506(c) analysis.	0.80	
TASK TOTAL 105				9.40	\$8,827.00

106 – EMPLOYEE BENEFITS/PENSIONS

02/07/24	MS	106	Legal research re: pension claims issues.	4.50
02/08/24	MS	106	Legal research relating to pension claims issues.	2.60

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				HOURS	AMOUNT
02/12/24	MS	106	Call with A. Sherman re: pension claims issues.	0.10	
02/12/24	MS	106	Emails with A. Sherman re: pension claims issues.	0.20	
02/12/24	MS	106	Draft and revise email to pension committee counsel re: pension claims issues.	0.80	
02/13/24	MS	106	Review email from A. Sherman re: pension claims issues.	0.20	
02/13/24	MS	106	Legal research relating to pension claims issues.	4.30	
02/16/24	MS	106	Review Pension plan documents re: pension claims issues.	0.70	
02/19/24	MS	106	Conduct legal research relating to pension claims standing issues.	0.80	
TASK TOTAL 106				14.20	\$11,857.00

107 – FEE/EMPLOYMENT APPLICATIONS

02/01/24	AHS	107	Review and revise initial fee application.	0.30	
02/01/24	GAK	107	Address additional fee application comments from A. Sherman and email local counsel regarding same.	0.50	
02/01/24	GAK	107	Call and email local counsel regarding fee application.	0.20	
02/01/24	GAK	107	Update fee application to incorporate comments of A. Sherman.	0.60	
02/01/24	GAK	107	Call with A. Sherman regarding fee application.	0.10	
02/01/24	GAK	107	Review and revise fee application for review by A. Sherman.	1.20	

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				HOURS	AMOUNT
02/02/24	GAK	107	Communications with B. Gainer regarding fee applications.	0.10	
02/06/24	GAK	107	Email local counsel regarding fee applications.	0.10	
02/06/24	GAK	107	Revise November fee statement.	0.20	
02/06/24	GAK	107	Draft December fee statement.	2.40	
02/07/24	BM	107	Analysis regarding CBRE retention application.	0.60	
02/07/24	MS	107	Review Debtors' motion to retain CBRE as real estate broker.	0.20	
TASK TOTAL 107				<u>6.50</u>	<u>\$5,229.50</u>

108 – FEE/EMPLOYMENT OBJECTIONS

02/07/24	GAK	108	Review Debtors' professional's December fee application.	0.10	
02/07/24	GAK	108	Review Debtors' application to retain CBRE.	0.20	
02/07/24	GAK	108	Review PCO's December and final fee applications.	0.20	
02/16/24	GAK	108	Review H2C January fee application.	0.10	
TASK TOTAL 108				<u>0.60</u>	<u>\$465.00</u>

109 – FINANCING

02/09/24	AHS	109	Call to coordinate response to PH distribution motion and have response drafted.	0.40	
02/09/24	AHS	109	Email to parties re: PH challenge issues, cash collateral hearing and distribution motion.	0.70	

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				HOURS	AMOUNT
02/13/24	AHS	109	Emails re: challenge complaint and causes of action.	0.30	
02/13/24	AHS	109	Call with counsel for PH re: extensions of challenge period and adjournments of hearing for cash collateral, distribution motion and follow up emails re: same.	0.60	
TASK TOTAL 109				2.00	\$2,150.00

110 – LITIGATION (OTHER THAN AVOIDANCE ACTION LITIGATION)

02/12/24	BM	110	Analysis regarding draft complaint against bondholder representatives asserting lien challenges and affirmative claims.	0.90	
02/12/24	JT	110	Review/revise complaint against Master Trustee.	1.80	
02/12/24	MS	110	Call with B. Mankovetskiy re: draft lien challenge complaint.	0.10	
02/12/24	MS	110	Emails with J. Teele re: draft lien challenge complaint.	0.20	
02/12/24	MS	110	Emails with A. Sherman re: draft lien challenge complaint.	0.10	
02/12/24	MS	110	Review and revise draft lien challenge complaint.	3.30	
02/12/24	MS	110	Draft email to Committee re: revised draft lien challenge complaint.	0.30	
02/13/24	JT	110	Revise/review final draft of complaint against Master Trustee.	2.10	
02/13/24	MS	110	Emails with B. Mankovetskiy re: extension of lien challenge deadline.	0.10	
02/13/24	MS	110	Emails with J. Teele re: revisions to draft lien challenge complaint.	0.10	

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				HOURS	AMOUNT
02/13/24	MS	110	Calls with B. Mankovetskiy re: revisions to draft lien challenge complaint.	0.10	
02/13/24	MS	110	Review and further revise draft lien challenge complaint.	2.30	
02/13/24	MS	110	Call with B. Mankovetskiy re: pension claims issues.	0.20	
02/22/24	BM	110	Analysis regarding revisions of draft complaint against bondholder representatives.	0.60	
02/22/24	MS	110	Emails with B. Mankovetskiy re: lien challenge complaint.	0.20	
02/22/24	MS	110	Review bankruptcy schedules re: lien challenge complaint.	0.20	
02/22/24	MS	110	Review and revise draft lien challenge complaint.	0.70	
02/27/24	MS	110	Emails with B. Mankovetskiy re: security interests in governmental payments and review statute re: same.	0.30	
02/28/24	MS	110	Confer with B. Mankovetskiy re: security interests in governmental payments.	0.10	
TASK TOTAL 110				<u>13.70</u>	<u>\$11,808.50</u>

113 – PLAN AND DISCLOSURE STATEMENT

02/01/24	AHS	113	Call with counsel for PH re: plan term sheet and challenge deadline issues.	0.30	
02/06/24	AHS	113	Call with D. Simon, F. Perlman re: plan and term sheet issues.	0.50	
02/07/24	AHS	113	Follow up on plan/term sheet issues with counsel for PH and counsel for pension committee; diligence re: pension committee issues.	0.60	

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				HOURS	AMOUNT
02/08/24	BM	113	Call with Pension Committee's counsel regarding potential plan of liquidation.	0.50	
02/08/24	AHS	113	Calls and emails with counsel for PH re: challenge deadlines, term sheet and review of extension email.	0.60	
02/08/24	AHS	113	Call with counsel for pension committee re: plan issues	0.50	
02/09/24	BM	113	Analysis regarding Debtors' proposed plan settlement term sheet.	1.10	
02/09/24	AHS	113	Review of plan term as circulated by counsel to Debtors.	0.40	
02/09/24	AHS	113	Email to committee re: plan term sheet as circulated and current state of issues with PH.	0.60	
02/09/24	JT	113	Research re: pre-plan distributions of assets.	2.70	
02/12/24	BM	113	Analysis regarding modified plan settlement term sheet.	1.20	
02/12/24	JT	113	Additional research re: pre-plan distribution issues.	1.30	
02/14/24	AHS	113	Calls and emails with FTI re: plan term sheet issues.	0.30	
02/15/24	BM	113	Analysis regarding potential plan settlement.	1.20	
02/15/24	AHS	113	Emails with counsel for Debtors re: plan and term sheet issues and coordinate with FTI to respond to term sheet.	0.80	
02/15/24	AHS	113	Call with committee member re: plan and term sheet issues.	0.30	
02/19/24	BM	113	Analysis and revisions of Debtors' plan settlement term sheet.	1.30	
02/19/24	BM	113	Analysis regarding plan settlement proposal.	1.10	

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				HOURS	AMOUNT
02/19/24	AHS	113	Call with FTI re: plan term sheet issues.	0.40	
02/19/24	AHS	113	Review and revise draft term sheet and circulate for internal review.	1.10	
02/20/24	BM	113	Analysis and revisions of proposed plan settlement term sheet and waterfall projections.	1.90	
02/20/24	BM	113	Call with counsel to Preston Hollow regarding plan settlement issues.	0.40	
02/20/24	AHS	113	Call with FTI re: plan and term sheet issues.	0.40	
02/20/24	AHS	113	Call with counsel for PH re: plan and term sheet issues.	0.50	
02/21/24	BM	113	Analysis regarding Debtors' draft plan and disclosure statement.	1.40	
02/21/24	BM	113	Call with bondholders' professionals regarding plan settlement proposal.	0.50	
02/21/24	BM	113	Call with Debtor's counsel regarding plan settlement issues.	0.30	
02/21/24	AHS	113	Emails and calls with Debtors' counsel re: plan and term sheet issues.	0.60	
02/21/24	AHS	113	Call with counsel for PH re: plan term sheet issues.	0.40	
02/21/24	OM	113	Research discriminatory treatment of unsecured creditors pursuant to section 1129 of the Bankruptcy Code.	1.10	
02/21/24	OM	113	Correspondence with A. Sherman and B. Mankovetskiy re: disparate treatment of unsecured creditors in bankruptcy plan research.	0.20	

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				HOURS	AMOUNT
02/21/24	OM	113	Research re: different treatment of unsecured creditors in a bankruptcy plan in context of section 1129 of the Bankruptcy Code.	1.60	
02/22/24	BM	113	Analysis regarding potential plan settlement.	1.20	
02/22/24	AHS	113	Emails with committee and members re: plan status.	0.30	
02/22/24	AHS	113	Calls with committee member re: plan and term sheet issues.	0.40	
02/22/24	AHS	113	Calls with FTI re: plan and term sheet issues.	0.50	
02/22/24	AHS	113	Call with FTI re: plan and term sheet issues.	0.50	
02/22/24	AHS	113	Analysis regarding plan filing issues, valuation of collateral, treatment of claims and 506(c) claims under applicable law.	1.20	
02/22/24	JT	113	Review proposed plan.	1.40	
02/22/24	MS	113	Confer with B. Mankovetskiy and A. Sherman re: draft plan.	0.20	
02/22/24	MS	113	Confer with B. Mankovetskiy re: objections to draft plan.	0.30	
02/22/24	MS	113	Confer with O. Matviyishyn re: legal research on draft plan and emails with O. Matviyishin re: same.	0.20	
02/22/24	OM	113	Finalize research re: unfair/discriminatory treatment in bankruptcy plan of different classes of unsecured creditors and circulate to J. Teele and M. Savetsky pursuant to instruction from B. Mankovetskiy.	2.20	

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				HOURS	AMOUNT
02/22/24	OM	113	Follow up research about unfair plan treatment pursuant to comments from M. Savetsky and circulate results of same to M. Savetsky.	0.60	
02/23/24	BM	113	Analysis regarding Debtors' proposed filed plan and disclosure statement.	2.20	
02/23/24	BM	113	Analysis regarding letter to Debtors regarding deficiencies in their proposed plan.	1.20	
02/23/24	BM	113	Analysis regarding Debtors' motion to shorten time in connection with disclosure statement hearing.	0.30	
02/23/24	AHS	113	Analysis regarding plan and term sheet issues and review of case law re: same.	1.70	
02/23/24	AHS	113	Review and revise draft order regarding disclosure statement hearing and emails with counsel re: same.	0.80	
02/23/24	AHS	113	Call with counsel for Preston Hollow re: plan as filed.	0.30	
02/23/24	AHS	113	Analysis of plan, term sheet issues and response to plan as filed.	0.90	
02/23/24	JT	113	Further review draft plan.	0.70	
02/23/24	JT	113	Research pension claim issues and treatment.	1.30	
02/23/24	GAK	113	Communications with A. Sherman regarding Debtors' request to shorten notice on disclosure statement hearing.	0.10	
02/23/24	MS	113	Review and analysis of Debtors' draft plan of liquidation and disclosure statement.	4.20	

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				HOURS	AMOUNT
02/23/24	OM	113	Review disclosure statement filed by Debtor and calendar and circulate critical dates to team.	0.20	
02/24/24	AHS	113	Email to counsel for pension committee re: plan issues and schedule call re: same.	0.20	
02/25/24	AHS	113	Email to Committee re: disclosure statement hearing issues.	0.20	
02/26/24	BM	113	Analysis regarding letter to stakeholders regarding Committee's initial views on Debtors' proposed plan.	1.20	
02/26/24	BM	113	Call with FTI regarding plan issues.	0.60	
02/26/24	BM	113	Call with counsel to Pensioners Committee regarding plan issues.	0.50	
02/26/24	AHS	113	Further analysis re: plan issues and objections to be raised.	0.70	
02/26/24	AHS	113	Call with counsel for pension committee re: plan issues.	0.50	
02/26/24	AHS	113	Call with committee re: plan issues.	0.50	
02/26/24	JT	113	Review/revise letter to debtor's counsel re: plan.	1.10	
02/26/24	GAK	113	Review combined Disclosure Statement/Plan.	0.80	
02/26/24	MS	113	Review collateral analysis and bankruptcy schedules re: same.	0.40	
02/26/24	MS	113	Draft and revise letter to D. Simon re: plan issues.	4.90	
02/26/24	MS	113	Emails with J. Teele re: plan issues.	0.30	
02/26/24	MS	113	Calls with O. Matviyishyn re: legal research on plan issues.	0.20	
02/26/24	MS	113	Conduct further research on plan issues.	0.20	

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				HOURS	AMOUNT
02/26/24	MS	113	Call with N. Ganti, J. Park and B. Mankovetskiy re: collateral analysis.	0.60	
02/26/24	MS	113	Call with B. Mankovetskiy re: Debtors' draft plan of liquidation.	0.20	
02/26/24	MS	113	Review legal research on plan issues.	0.30	
02/26/24	MS	113	Emails with O. Matviyishyn re: legal research on plan issues.	0.20	
02/26/24	OM	113	Research standards for debtor releases in the Eighth Circuit.	1.10	
02/27/24	AHS	113	Email to client re: plan issues and infirmities.	0.20	
02/27/24	AHS	113	Review of case law re: confirmation, classification and treatment issues.	0.60	
02/27/24	AHS	113	Review and revise letter to counsel re: plan issues and infirmities.	1.20	
02/27/24	JT	113	Office conference with M. Savetsky re: proposed plan.	0.30	
02/27/24	JT	113	Review/revise letter to debtor's counsel re: proposed plan.	0.60	
02/27/24	MS	113	Review and revise letter to key parties on plan related issues.	1.20	
02/27/24	MS	113	Confer with A. Sherman and J. Teele re: plan related issues and confer with B. Mankovetskiy re: same.	0.20	
02/27/24	MS	113	Emails with A. Sherman re: letter to key parties on plan related issues.	0.20	
02/27/24	MS	113	Draft email to Committee re: plan related issues and emails with A. Sherman re: same.	0.20	
02/27/24	MS	113	Review cases re: plan related research.	0.20	

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				HOURS	AMOUNT
02/27/24	MS	113	Emails with O. Matviyishyn re: plan related research.	0.20	
02/27/24	OM	113	Research debtor releases pursuant to comments and instructions from M. Savetsky and provide draft analysis to M. Savetsky re: same.	2.10	
02/28/24	AHS	113	Finalize and send out letter and notice of status conference.	0.60	
02/28/24	OM	113	Prepare letter to D. Simon re: plan and request for status conference to be filed by R. Gainer of local counsel.	0.50	
02/29/24	BM	113	Analysis regarding potential ADR process for resolving plan issues.	0.60	
02/29/24	AHS	113	Email to counsel re: plan process and call from R. Gainer re: pension issues.	0.40	
02/29/24	GAK	113	Review notification regarding hearing on Disclosure Statement.	0.10	
TASK TOTAL 113				<u>73.10</u>	<u>\$64,089.50</u>

114 – RELIEF FROM STAY PROCEEDINGS

02/07/24	MS	114	Review McKesson's motion for distribution of sale proceeds and cash collateral order re: same.	0.30	
02/20/24	MS	114	Emails with B. Mankovetskiy re: Debtors' motion to transition self-insured workers' compensation program into administration, settlement, and wind down.	0.10	

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				HOURS	AMOUNT
02/20/24	MS	114	Review Debtors' motion to transition self-insured workers' compensation program into administration, settlement, and wind down.	0.50	
02/20/24	MS	114	Review revised proposed order resolving McKesson's motion for distribution of sale proceeds.	0.10	
TASK TOTAL 114				1.00	\$835.00
TOTAL FEES at Standard Rates				166.00	\$135,914.00
Attorney Fees at Blended Rate of \$675				166.00	\$112,050.00
Paralegal Fees at Standard Rate				0.00	0.00
TOTAL FEES at Blended Rate				166.00	\$112,050.00

TASK CODE SUMMARY

101	Asset Analysis and Recovery	4.70	\$4,338.50
102	Asset Disposition	26.80	\$15,994.00
103	Business Operations	0.20	\$167.00
104	Case Administration	13.80	\$10,153.00
105	Claims Administration and Objections	9.40	\$8,827.00
106	Employee Benefits/Pensions	14.20	\$11,857.00
107	Fee/Employment Applications	6.50	\$5,229.50
108	Fee/Employment Objections	0.60	\$465.00
109	Financing	2.00	\$2,150.00
110	Litigation (Other than Avoidance Action Litigation)	13.70	\$11,808.50
113	Plan and Disclosure Statement	73.10	\$64,089.50
114	Relief from Stay Proceedings	1.00	\$835.00
TOTAL FEES at Standard Rates		166.00	\$135,914.00
Attorney Fees at Blended Rate of \$675		166.00	\$112,050.00
Paralegal Fees at Standard Rate		0.00	0.00
TOTAL FEES at Blended Rate		166.00	\$112,050.00

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Andrew H. Sherman	23.40	x	\$1,075.00	=	\$25,155.00
Boris Mankovetskiy	45.00	x	\$925.00	=	\$41,625.00
Jason Teele	17.80	x	\$895.00	=	\$15,931.00
Michael Savetsky	40.30	x	\$835.00	=	\$33,650.50
Gregory A. Kopacz	7.90	x	\$775.00	=	\$6,122.50
Oleh Matviyishyn	31.60	x	\$425.00	=	\$13,430.00

INVOICE SUMMARY

Total Fees	\$112,050.00
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Total Disbursements	\$0.00
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TOTAL THIS INVOICE	<u>\$112,050.00*</u>
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*Total includes fees at **Blended Rate**. Per Retention Application, lesser of fees at *Standard Rates* (**\$135,914.00**) and fees at *Blended Rate* of \$675 (**\$112,050.00**)** apply.

**includes paralegal fees at standard rates, if applicable